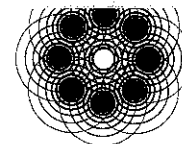
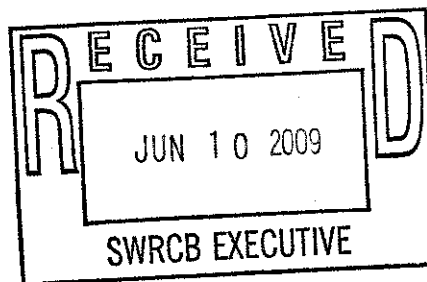


June 10, 2009

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 "I" Street, 24th Floor  
Sacramento, CA 95814



Subject: Resolution to Clarify Implementation of Federal Economic Recovery Legislation for the CWSRF Program.

Dear Members of the State Water Resources Control Board:

Thank you for the opportunity to provide comments regarding the item to clarify the process and criteria for prioritizing CWSRF projects for ARRA subsidy funding to be heard at the June 16, 2009 Board Meeting. We support the general policies and approach outlined in the staff's recommendations but have some comments regarding implementation of Option 2C.

As stated in the staff report, urban stormwater projects have previously been underfunded but have the ability to vastly reduce pollution from urban sources and provide multiple benefits to numerous stakeholders. By focusing on Disadvantaged Community (DAC), as suggested by Option 2C, we can ensure funds are allocated equitably throughout the state. However, the approach to determining whether a project serves a Disadvantaged Community (DAC) may require evaluation on a project by project and even block by block basis. Typically urban storm water projects serve many communities and may serve DACs without being directly located within a DAC. For example, a project that reduces pollutant loads to the Los Angeles River from any location within the watershed serves DACs downstream by virtue of the proximity of DACs to the LA River along its length.

We would therefore request that applicants be allowed to justify how a project serves a DAC rather than the Water Board using a definition that would require a project to be located within a DAC to receive this designation. We would also request that you modify the staff recommendation #2 to add that urban stormwater projects with the earliest construction dates (option 2B) are prioritized after those serving DACs (option 2C). Thank you for your consideration of our comments.

Sincerely,

Nancy L. C. Steele, D.Env.  
Executive Director

Disclaimer: The Watershed Council's determination that a statement is consistent with our mission and vision does not imply that all individual agencies and organizations represented on the Board of Directors concur with, or have reviewed, the statement.

**The Los Angeles & San Gabriel Rivers Watershed Council**  
700 N. Alameda Street, Los Angeles, CA 90012 T 213/ 229-9945 F 213/ 229-9952